

June 2, 2023

**VIA ECF**

Honorable Jennifer E. Willis  
United States District Court  
Southern District of New York  
40 Foley Square, Room 425  
New York, NY 10007

**Re: *Columbia University v. Encyclopaedia Iranica Foundation*, 19-cv-7465 (AT) (JW);  
*Encyclopaedia Iranica Foundation v. Columbia University et al.*, 19-cv-8562 (AT) (JW)**

Dear Judge Willis:

Encyclopaedia Iranica Foundation (“EIF”) and Columbia University (“Columbia”) submit this joint letter motion to respectfully request that the Court so order the parties’ proposed stipulation, attached hereto as Exhibit 1, amending the Protective Order entered by the Court on February 9, 2022 (*see* 19-CV-7465, ECF No. 161), relating to the disposition of confidential information produced in this litigation.

EIF and Columbia have reached a settlement that resolves their claims against each other in the above-captioned litigation. As noted in our May 31, 2023 joint status update to the Court (*see* 19-CV-7465, ECF No. 213), as part of that settlement, EIF and Columbia have jointly agreed to amend the provision of the Protective Order relating to the disposition of confidential information produced in the litigation.

In light of the Court’s June 1, 2023 order (*see* 19-CV-7465, ECF No. 214), the parties also respectfully request that the Court reopen the above-captioned litigation for the sole purpose of so-ordering the proposed stipulation, to the extent the Court deems that step to be necessary. The parties do not seek to have the Court retain jurisdiction over the litigation for purposes of enforcing the parties’ settlement agreement.

We thank the Court for its attention to this matter.

Respectfully submitted,

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cc: All counsel of record (via ECF)